

FRANCIS HOWELL SCHOOL DISTRICT

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GRAND JUNCTION OFFICE

September 4, 2002

Audrey Berry
U.S. Department of Energy
2597 B3/4 Road
Grand Junction, Colorado 81503

Re: WSRRAP-St. Charles County, Missouri

Dear Ms. Berry:

According to the St. Louis Post, at the Wednesday (8/28/02) night meeting, "harsh criticism from St. Charles County residents and Missouri officials was directed at federal officials...(who) admitted that there were "some holes" in their plan for managing radioactive waste at Weldon Spring". (St. Louis Post-Dispatch-Thursday, August 29, 2002)

Francis Howell High School is less than "one-sixteenth" of a mile from the Weldon Spring site. For a number of years, the Department of Energy paid for independent consultative services contracted by the district during the remediation project. We were notified last November that the DOE would no longer pay for these professional services. Based upon community concerns and federal official admittance that there were "some holes" in the radioactive waste management plan, the district believes it is important and appropriate for the DOE to reestablish and continue payment for consultative services until the high school site no longer serves as an educational campus and support services center.

Response I-1: The "holes" in the Long-Term Stewardship (LTS) Plan referred to details of stewardship activities that have not been resolved, such as institutional controls for the Ground Water Operable Unit at the site and the restrictive easements and other legal instruments associated with institutional controls. Radioactive materials and other wastes (e.g. asbestos) have been remediated and encapsulated in the disposal cell in accordance with approved Records of Decision that were based on approved health and environmental risk assessments. Because there are no longer any activities at the site that could pose a risk to the students and faculty at the school, the intent and purpose of the professional consultant services for the school are fulfilled and are no longer considered necessary.

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In addition, continuous air monitoring was conducted during the razing of the Weldon Spring site buildings and ensuing clean up. We urge you to reestablish regular air monitoring and well-water testing to address any future questions or concerns on the part of district patrons and the community at large.

Response I-2: Air monitoring activities during the remediation and cell construction activities indicated that the high school and other locations near the site were not exposed to airborne hazards (radioactive air particulates, radon gas or asbestos) from the site activities. With the cell completed, there is no longer a source of these airborne hazards; therefore, air monitoring is no longer required. DOE provided written notice to FHSD, as well as other critical receptors, prior to the discontinuation of air monitoring in December 2000. The LTS Plan contains a provision for monitoring for radon in the unlikely event that the cell cover is breached and the radioactive contents are exposed to the air.

Contaminated ground water remains at the site, and DOE will continue to sample a network of monitor wells and springs. The LTS Plan includes maps showing the monitor well locations, sampling frequency, and the constituents that continue to be analyzed, and will incorporate any additional monitoring requirements stipulated by the pending Ground Water Operable Unit Record of Decision. Sampling will continue until the requirements of the Records of Decision are met.

It is our understanding that no other United States hazardous waste site exists as close as the Weldon Spring site to a school. Because of that fact, we believe it prudent, moral, and ethical for the U.S. Government and DOE

specifically to take management measures that insure the health and safety of the students and staff located in close proximity to the "cell".

Please inform us of management plan specifics as they relate to the students and staff of Francis Howell High School.

Response I-3: DOE continues to honor our long standing commitment to ensure protectiveness of the students and faculty at the Francis Howell High School. DOE focused an intense 14 year monitoring effort at a dedicated monitoring location adjacent to the high school in order to assure that any impact due to our remedial actions could be rapidly assessed and corrective actions could be taken. DOE fulfilled its commitment that the high school would never be exposed to above-background concentrations of site contaminants. This commitment also included monies for an independent consultant to review all the data.

The school district is on the contact list for distribution of the annual and 5-year review reports. Documents pertaining to site remediation and stewardship will be available at the site Interpretive Center and at the Middendorf-Kredell branch of the St. Charles City-County Library System. These documents and other site information, including all historical and current ground water and surface water quality data, will be available for public access on the LTSM Program website

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(http://www.gjo.doe.gov/programs/ltsm). Annual public meetings will be held by DOE to discuss site activities and public concerns.

Sincerely,

Dr. Dan O'Donnell Superintendent

DEO/vf

Cc: U.S. Representative Todd Akin U.S. Senator Jean Carnahan

U.S. Senator Christopher Bond